

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

United States of America )

v. )

JOHN LEE PRICE, III and )  
AHMED KARIM BARRIE )

Case No. 1:23-mj-659

ARTHUR JOHNSTON, CLERK

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 21, 2023 in the county of Harrison in the  
Southern District of MS, Southern Division, the defendant(s) violated:*Code Section*

21 U.S.C. § 841(a)(1)

*Offense Description*

Possession with intent to distribute a controlled substance

This criminal complaint is based on these facts:


See affidavit attached hereto and incorporated herein

☒ Continued on the attached sheet.  
*Complainant's signature*

Robert W. Drace, Task Force Officer

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 11-21-2023  
*Judge's signature*City and state: Gulfport, Mississippi

Robert P. Myers, Jr, United State Magistrate Judge

*Printed name and title*

## **AFFIDAVIT**

I, Robert W. Drace, being a first duly sworn, state as follows:

### **Introduction**

I am Task Force Officer (TFO) Robert W. Drace with the United States Department of Justice, Drug Enforcement Administration (DEA). I have been a Deputy of the Harrison County Sheriff's Office for twenty-one years with the last twelve years being assigned to the narcotics division. I am presently serving as the Narcotics Commander for the Harrison County Sheriff's Office. I also serve as a Task Force Officer to the DEA and have been in this capacity since September 2013. In my tenure as a law enforcement officer, I have participated in numerous investigations of illegal narcotics trafficking to include violations of Title 21 of the United States Code. Many of the investigations involved the sale, transportation, and distribution of narcotics often leading to arrest and subsequent due process proceedings.

### **Probable Cause Factual Basis**

Your affiant states that on Tuesday, November 21, 2023, at approximately 1:22 am, Harrison County Sheriff's Office Sergeant Chris Sexton initiated a traffic stop on a 2017 Ford F350 pickup bearing Texas license PVS 4039 with a horse trailer in-tow on Interstate 10 West near the 40 Mile-Marker in Biloxi, Mississippi. The traffic stop was a result of observations by Sergeant Sexton where the vehicle was observed driving carelessly by weaving within its lane and striking the lane divider on multiple occasions.

Sergeant Sexton subsequently made contact with the occupants and identified the driver as John Lee Price III and the front seat passenger as Ahmed Karim Barrie. While explaining the reason for the traffic stop, Sergeant Sexton noticed a heightened level of nervousness amongst the occupants evident by uncontrollable shaking of their hands as they produced their drivers license and heavy breathing. Sergeant Sexton then engaged Price in conversation about his current travels where he claimed to have traveled from "up north" delivering horses. While at the passenger side window, Sergeant Sexton smelled an odor of marijuana emitting from the vehicle and instructed the occupants to exit the vehicle. Sergeant Sexton then asked about the odor of marijuana with both denying any knowledge of drugs being in the vehicle.

Due to Price's implausible travel itinerary coupled with their heightened level of nervousness and the odor of marijuana, Sergeant Sexton suspected that criminal activity was afoot, more specifically drug trafficking, leading him to request a certified narcotic detecting canine to conduct an open-air sniff of the vehicle. A subsequent open-air sniff of the vehicle was conducted that resulted in a positive response for the presence of controlled substances.

A search of the vehicle and trailer ensued where a search of the living quarters of the trailer yielded a black duffle bag containing (8) large plastic bags each containing multiple individual plastic bags containing numerous round orange pills and round blue pills. The markings on the

pills suggested that the pills were Adderall and Oxycodone. Based on training and experience, Agents suspected the pills to be fake pills as the appearance, branding and inconsistency in sizing and weight suggest they were not commercially manufactured and likely pressed illegally and clandestinely. Current trends and recent seizures of similar pills have identified that these types and brands of fake pills are known to contain fentanyl. Agents also located bulk currency estimated to be approximately \$15,000.00 to \$20,000.00 within the cab of the truck and in their personal luggage.

Based on the findings, Price and Barrie were transported to the Harrison County Sheriff's Office Narcotics Division where Price was advised of his rights, per Miranda which he acknowledge and waived agreeing to questioning. In a subsequent interview, Price denied any knowledge of the pills but related that Barrie would take responsibility for the possession of any pills. Barrie requested an attorney and was not interviewed.

In all, agents recovered approximately 30,000 to 50,000 pills suspected to have been clandestinely manufactured with fentanyl. The total package weight of the pills weighed approximately (12,019) grams. A preliminary field test was conducted on the aforementioned pills resulting in a presumptive positive reaction for the presence of fentanyl.

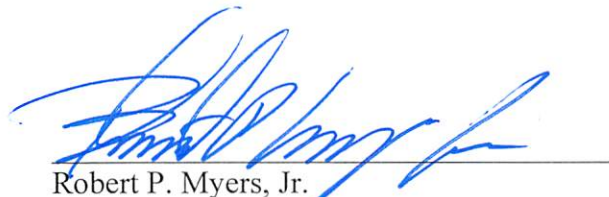
### Conclusion

Based on my experience as a DEA Task Force Officer and the facts listed above involving John Lee Price III and Ahmed Karim Barrie, it is determined there is sufficient probable cause to believe Price and Barrie violated Title 21, United States Code, Section 841 (a), in the Southern District of Mississippi by possessing with the intent to distribute a mixture of a substance containing in excess of 500 grams of fentanyl.



Robert W. Drace  
Task Force Officer  
US Drug Enforcement Administration

Sworn and subscribed to me  
this 21<sup>st</sup> day of November 2023.



Robert P. Myers, Jr.  
United States Magistrate Judge



